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The Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Ronald Ruegg  
21 Cr. 120 (PGG)

Dear Judge Gardephe:

I represent Ronald Ruegg in the above referenced matter. I write to request a modification of the bail conditions for Mr. Ruegg to allow him to travel Tucson Arizona to assist in the relocation of his elderly father from his home in Tucson, Arizona to a retirement facility in San Diego California. The move would allow Mr. Ruegg's father to reside close to family members in San Diego.

If permitted Mr. Ruegg would travel by air to Tucson, AZ on September 28, 2021 and return to New York by air on October 8, 2021. Mr. Ruegg would reside with his father in Tucson for a few days to help with the preparation for the move. He would then travel with his father by car to San Diego. In San Diego, he would reside with at his brother's house while he settles his father into the retirement facility.

Pretrial services and the government consent to this request.

Respectfully submitted,  
/s/


Donald duBoulay  
305 Broadway, Suite 602  
New York, New York 10007  
Attorney for Mr. Ruegg

cc: Ni Qian, Esq., AUSA  
Erin Cunningham, PTO

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** September 20, 2021